

UNITED STATES DISTRICT COURT  
for the  
Western District of North Carolina

United States of America )  
v. )  
 ) Case No. 3:23-mj-00453-WCM  
 )  
 )  
 )  
 )  
Chirag Tomar )  
Defendant(s) )

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 22, 2020 through the present in the county of MECKLENBURG in the  
WESTERN District of NORTH CAROLINA, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1349	WIRE FRAUD CONSPIRACY
18 U.S.C. § 1956(h)	MONEY LAUNDERING CONSPIRACY

This criminal complaint is based on these facts:  
SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet.

/s/ Michael S. Hackney  
*Complainant's signature*

Michael S. Hackney USSS/SA  
*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P 4.1 by telephone.

Signed: December 20, 2023



W. Carleton Metcalf  
United States Magistrate Judge

Date: 12/20/2023

City and state: Asheville, North Carolina

The Hon. W. Carleton Metcalf, US Magistrate Judge  
*Printed name and title*

